

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

LORA FREIER-HECKLER

Plaintiff,

v.

DENIS MCDONOUGH,
SECRETARY, DEPARTMENT OF
VETERANS' AFFAIRS, et al.,

Case No. 1:20-CV-00367

JUDGE DONALD C. NUGENT

DECLARATION OF PHILIP E. RUTLEDGE II

I, PHILIP E. RUTLEDGE II, declare the following under 28 U.S.C. § 1746, and state that under penalty of perjury the following is true and correct to the best of my knowledge and belief:

1. I am currently employed by the Louis Stokes Cleveland VA Medical Center ("VA") as the Chief, Logistics Service.

2. The Logistics Service at the VA consists of more than 100 employees in nine different sections including transportation, warehouse, and materials management.

3. In 2014, I was a part of a panel that interviewed candidates—both men and women—for the position of Assistant Chief, Logistics Service. I selected the Plaintiff, Dr. Lora Freier-Heckler, for the position because I thought she was the most qualified person for the job.

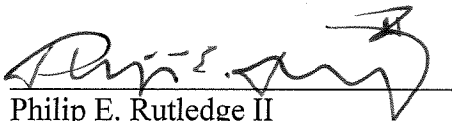
4. Prior to selecting Dr. Freier-Heckler as the Assistant Chief for Logistics, she and I knew each other and were personal friends. So, I did not think anything of it when I asked her to watch my son in the afternoon for a few hours one time or watch my house when I went out of town one time.

5. I referred to Dr. Freier-Heckler by her first name. She did the same to me. I did not start calling her doctor after she chose to obtain a Ph.D. If she had an issue with me not calling her “doctor,” she never told me. I would have addressed her as “doctor” if she told me she preferred that.

6. During Dr. Freier-Heckler’s tenure in Logistics Service, the department grew, and I moved her office next to mine in a management suite. The suite was across the hall and no more than approximately 30 feet away from where the other employees’ work areas were located.

7. I have never treated Dr. Freier-Hecker in a discriminatory, hostile, or retaliatory manner.

I declare that the foregoing is true and correct to the best of my knowledge and belief, and it is given under penalty of perjury pursuant to 28 U.S.C. § 1746.


Philip E. Rutledge II
Chief, Logistics Service
Cleveland VA Medical Center

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Date